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MARY J. SISAK
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SALVATORE TAILLEFER

June 30, 2014

ARTHUR BLOOSTON 1914 - 1999

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### REDACTED - FOR PUBLIC INSPECTION

VIA HAND DELIVERY

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, DC 20554

RE: Form 481 – Carrier Annual Reporting Data Collection Form WC Dockets No. 10-90, 11-42 and 14-58
Rice Belt Telephone Company (SAC 401721)

Dear Ms. Dortch:

Pursuant to Sections 54.313(i) and 54.422(c) of the Commission's Rules, Rice Belt Telephone Company ("the Company") hereby submits a copy of its "FCC Form 481 – Carrier Annual Reporting Data Collection Form," which was or will be timely filed with the Universal Service Administrative Company and the appropriate state commission on or before July, 1, 2014.

The Company seeks confidential treatment under the *Protective Order* adopted by the Commission in this proceeding for the financial information included in its report pursuant to

§54.313(f)(2). Confidential treatment of this information is appropriate on the grounds that it is commercially sensitive information that is not normally released to the public. In accordance with the *Protective Order*, the Company is submitting one copy of its FCC Form 481 (which includes a Stamped Confidential Document containing its proprietary and confidential financial information) via hand delivery to the Secretary's Office, and two copies of the same FCC Form 481 (including the Stamped Confidential Document) via hand delivery to Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, 445 12th Street, S.W., Room 5-A452, Washington, D.C. 20554. The Company is also submitting two copies of its FCC Form 481 (which includes a Redacted Confidential Document with its proprietary and confidential information obscured) via hand delivery to the Secretary's Office under a separate cover letter marked "REDACTED – FOR PUBLIC INSPECTION" and via the Electronic Comment Filing System.

The Company has submitted a separate letter requesting confidential treatment pursuant to Section 0.459 of the Commission's Rules for certain proprietary and confidential portions of its five-year service improvement plan and the prices of its voice and broadband service offerings.

Respectfully submitted

Gerard J. Duffy

cc: Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau

<sup>&</sup>lt;sup>1</sup> In the Matter of Connect America Fund, et al., PROTECTIVE ORDER, WC Docket No. 10-90, et al., DA 12-1857, released November 16, 2013.

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ARTHUR BLOOSTON 1914 - 1999

June 30, 2014

WRITER'S CONTACT INFORMATION

(202) 828-5528 gjd@bloostonlaw.com

WC Docket Nos. 10-90, 11-42 and 14-58 Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW

Room TW-A325

Washington, DC 20554

RE: Rule Section 0.459 Request for Confidential Treatment Rice Belt Telephone Company (SAC 401721)

FCC Form 481 - Carrier Annual Reporting Data Collection Form

Dear Ms. Dortch:

Rice Belt Telephone Company ("the Company"), by its attorney, hereby requests, pursuant to Section 0.459 of the Commission's Rules, that the redacted portions of the Company's five-year service improvement plan and voice and broadband price offerings be withheld from public inspection.

In accordance with Section 0.459(b) of the Commission's Rules, the Company states:

- 1. The specific information for which confidentiality is sought is comprised of the tables detailing annual projected network improvements and upgrades for voice and broadband services during the period from 2015 through 2019, and projecting the build-out costs of such projects during the same five-year period, plus the rates for its various voice and broadband service offerings.
- 2. This information is submitted in compliance with: (a) the requirement in Section 54.313(a)(1) of the Commission's Rules that recipients of high-cost support submit a progress report on their five-year service quality improvement plans; and (b) the requirement in Section 54.313(a)(7) of the Rules that recipients submit their price offerings in a format specified by the Wireline Bureau.

Marlene H. Dortch, Secretary June 30, 2014 Page 2 of 3

- 3. This information regarding the nature and timing of the Company's construction and network improvement plans, the estimated costs thereof, and its various price offerings is proprietary and confidential commercial and financial information that is routinely withheld from public inspection.
- 4. The voice and broadband services for which the 5-year service improvement plans have been prepared are subject to actual or potential competition from competitive local exchange carriers, cable television system operators, electric power utilities, fixed and mobile wireless service providers, and/or satellite carriers. Even where competition is not active at present, the nature and scheduling of the Company's network upgrades, the size and timing of its related expenditures, and the prices of its various service offerings constitute very valuable competitive intelligence for any entity that may be contemplating or planning entry into one or more portions of the Company's service area.
- 5. Again, whether or not the Company has an active competitor in a particular exchange at the present time, there are numerous potential competitors and the nature and scheduling of the Company's network upgrades, the size and timing of its related expenditures, and the prices of its service offerings constitute very valuable competitive intelligence that can greatly assist the planning of any entity that may be competing or contemplating entry into one or more portions of the Company's service area.
- 6. The Company limits internal access to its 5-year service improvement plan to its key employees and consultants who need the information for planning, reporting and management purposes. The plan is not posted on any Company website, or included in any Company press release, report or other document that is available to the general public or to unrestricted portions thereof.
- 7. The Company does not make its 5-year build-out plans available to the public, and has not previously disclosed the present plan or similar previous plans to third parties. Whereas the Company does make its various prices available to its existing and potential customers, competitors should not be able to obtain them readily by going to the Commission's website.
- 8. The Company requests that the individual charts included in its 5-year plan not be available for public disclosure until at least the end of 2020, the next full calendar year after the completion of its following the calendar year to which the chart applied. Competitors and potential competitors should not be able to see the Company's network deployment and expenditure plans until a year after the end of the plan period (particularly because weather and other factors can cause construction delays). After that period, projects are generally completed, and competitors are able to observe directly or read published reports of what the Company actually did to improve its network and services.

Marlene H. Dortch, Secretary June 30, 2014 Page 3 of 3

The Company notes that it is also redacting and claiming confidential treatment, pursuant to the Bureau's *Protective Order*, DA 12-1857, released November 16, 2012, for the financial information submitted in compliance with the requirements of Section 54.313(f)(2) of the Commission's Rules.

Respectfully submitted,

Rice Belt Telephone Company

sy:

Its Attorney

Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP 2120 L Street NW (Suite 300) Washington, DC 20037 Telephone: (202) 659-0830

Facsimile: (202) 828-5568 Email: gjd@bloostonlaw.com

- 1	Data Collection Form	July 2013
*410.5	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Stephanie Hall
<035>	Contact Telephone Number: Number of the person identified in data line <0302	8129352215 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	stophanic.wall@emithvillc.net
- 1		54.313 54.422
ANNÚA	L'REPORTING FOR ALL CARRIERS	Completion   Completion   Required   Required
-100-	Control Overlies I and the Department	(check box when complete)
	Service Quality improvement Reporting	
<200> <210>	Outage Reporting (voice)	[complete attached worksheet]
<300>	Unfulfilled Service Requests (voice)	to outages to report
13007	omenine service respects (vise)	
<310>	Detail on Attempts (voice)	All III
		(attach descriptive document)
<320>	Unfulfilled Service Requests (broadband)	WILL V
		- Lankus
<330>	Detail on Attempts (broadband)	(attach descriptive document)
100000		
<400>	Number of Complaints per 1,000 customers (voice)	
<420>	Mobile 0.0	
<430>	Number of Complaints per 1,000 customers (broad	(band)
<440>	Fixed 0.0	
<450> <500>	Mobile 0.0 Service Quality Standards & Consumer Protection F	Rules Compliance (check to Indicate certification)
10	401721ar510.pdf	
<510>		(attached descriptive document)
		in the second se
<600>	Functionality in Emergency Situations 401721ar610.pdf	(check to Indicate certification)
		(attached descriptive document)
-610-		attacks acceptine occurrenty
<610>		TANKAN TA
<700>	Company Price Offerings (voice)	(complete attached worksheet)
<710> <800>	Company Price Offerings (broadband)  Operating Companies and Affiliates	(complete attached worksheet)
	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)
	Voice Services Rate Comparability	(check to indicate certification)
<1010>		(attach descriptive document)
<1100>	Terrestrial Backhaul (Y/N)?	(y not, check to indicate certification)
<1110>		(complete attached worksheet)
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)
1	Price Cap Carriers, Proceed to Price Cap Additional	7 S S S S S S S S S S S S S S S S S S S
<2000>	Including Rate-of-Return Carriers affiliated with Pr	cice Cap Local Exchange Carriers (check to indicate certification)
<2005>		(complete attached worksheet)
	Rate of Return Carriers, Proceed to ROR Additional	
<3000>		(check to Indicate certification) (complete attached worksheet)
<3005>		icomplete attached worksheet

1050

H	ervice Quality Improvement Reporting Illection Form	2	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code 44	01721	
<015>	Study Area Name	CE BELT TEL CO	
<020>	Program Year 2	015	
<030>	Contact Name - Person USAC should contact regarding this data	tephanie Wall	
<035>	Contact Telephone Number - Number of person identified in data line <030>	129352215 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030> =	tephanie.wall@smithville.net	
<110>	Has your company received its ETC certification from the FCC?	(yes / no ) O	
<111>	If your answer to Line <110> is yes, do you have an existing \$54.202(a) "5 year plan" filed with the FCC?	(yes / no ) O	
<112>	If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your common CETC which only receives frozen support, your progress report is only required to address voice telephony service.	pany is a	
	Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.		Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets		
	Maps detailing progress towards meeting plan targets  Report how much universal service (USF) support was received		
114>			
<114> <115>	Report how much universal service (USF) support was received		
<113> <114> <115> <116> <117>	Report how much universal service (USF) support was received How (USF) was used to improve service quality		

(200) Service Outage Reporting (Voice)		FCC Form 481.
Data Collection Form	librie	OMB Control No. 3060-0986/OMB Control No. 3060-0819
W II		July 2013

<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129352215 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie.wall@smithville.net

<220>

<a>&gt;</a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h>&gt;</h>
NORS Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
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Data Col	ce Offerings including Voice Rate Data lection Form	FCC Form 481 OMB Control No. 3060-9986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129352215 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030	stephanie.wall@smithville.net
<701> <702>	Residential Local Service Charge Effective Date  1/1/2014 Single State-wide Residential Local Service Charge	

State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fe
				<u> </u>				
		-						
				See a	tached worksheet			<del> </del>
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(710) Broadband Price Offerings	FCC Form	81
Data Collection Form	OMB Cont	ol No. 3060-0986/OMB Control No. 3060-0819
	July 2013	

<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129352215 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie.wall@umithville.net

State	Exchange (SLEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select
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			worksheet -					
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	erating Companies ection Form				FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-081 July 2013
<010>	Study Area Code	52	401721		
<015>	Study Area Name		RICE BELT TEL	CO	ST.
<020>	Program Year		2015	2592011-1-1-1-2-1-1-1-1-1-1-1-1-1-1-1-1-1-1	
<030>	Contact Name - Person	USAC should contact regarding this data	Stephanie Wall		
<035>	Contact Telephone Nun	nber - Number of person identified in data line <030>	8129352215 ext	•	17. The second s
<039>	Contact Email Address	Email Address of person identified in data line <030>	scephanie.wal	l@smithville.net	
<810>	Reporting Carrier	Rice Belt Telephone Company Inc.			
<811>	Holding Company	Rice Belt Holding Inc.			
<812>	Operating Company	Rice Belt Telephone Company Inc.			
<813>		<b>(1)</b>	7, 1, 2 <b>4</b>	<a2></a2>	⟨a3⟩
		Affiliates		SAC	Doing Business As Company or Brand Designation
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Control of the State of the Sta	al Lands Reporting ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person identified in data line <030	
<039>	Contact Email Address - Email Address of person identified in data line <03	
<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	Name of Attached Document
to confir demons	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes rm the status described on the attached document(s), on line 920, trates coordination with the Tribal government pursuant to 8(a)(9) includes:	Select Yes,No, NA)
<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	
	5. S.	

	Terrestrial Backhaul Reporting ection Form	FCC Form 481 OMB Control No.: 3060-0986/OMB Control No.: 3060-0819 July 2013
<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person identified in data line <03	> 8129352215 ext.
<039>	Contact Email Address - Email Address of person identified in data line <03	3> stephanie.wall@smithville.net
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)	
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)	

Lifeline	rms and Condition for Lifeline Customers ection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person identified in data line <03	
<039>	Contact Email Address - Email Address of person identified in data line <0	
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	Name of Attached Document
<1220>	Link to Public Website HTTP	://ricebelt.net/lifeline-guidelines/
or the we	neck these boxes below to confirm that the attached document(s), on line 1210, ibsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	Details on the number of minutes provided as part of the plan,	
<1223>	Additional charges for toll calls, and rates for each such plan.	×

ata Collection Form           including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers           <010> Study Area Code         401721           <0.05> Study Area Name         RICE BELT TEL CO           <0.00> Program Year         2015	OMB Control No. 3060-0986/OMB Control No. 3060-0 July 2013
<010> Study Area Code 401721 <015> Study Area Name RICE BELT TEL CO	Julý 2013
<015> Study Area Name RICE BELT TEL CO	
<015> Study Area Name RICE BELT TEL CO	
Man De V	
<020> Program Year 2015	
030> Contact Name - Person USAC should contact regarding this data Stephanie Wall	
<035> Contact Telephone Number - Number of person identified in data line <030> 8129352215 ext.	
<a>Contact Email Address - Email Address of person identified in data line &lt;030&gt; stephanie.wall@smithville.net</a>	
HECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost supp	
support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form	and in the documents attached below is accurate.
Incremental Connect America Phase I reporting	
2010> 2nd Year Certification (47 CFR § 54.313(b)(1))	
O11> 3rd Year Certification (47 CFR § 54.313(b)(2))	
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	
2012> 2013 Frozen Support Certification	
2013> 2014 Frozen Support Certification	H
2014> 2015 Frozen Support Certification	
2015 > 2016 and future Frozen Support Certification	<del></del>
2010 and rotale Frezen support CertainStrok	
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))	
2016> Certification Support Used to Build Broadband	
Connect America Phase II Reporting {47 CFR § 54.313(e)}	
2017> 3rd year Broadband Service Certification	
2018> 5th year Broadband Service Certification	
2019> Interim Progress Certification	
Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and	nation
addresses of community anchor institutions to which began providing access to broadband service in the	
preceding calendar year.	
l l	
2001s Indiana Paraman Community Assistant Indiana	
2021> Interim Progress Community Anchor Institutions	
1	
Na Na	me of Attached Document Listing Required Information

Sec. 1		July 2019
<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129352215 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie.wall@smithville.net
	he baxes below to note compliance on its five year service quality plan (pursua	ALIGNIFICATION AND ACCUPANCE CONTROL OF THE CONTROL OF T
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))	
		Name of Attached Document Listing Required Information
(8011)	Please check this box to confirm that the attached document(s), on line $\frac{1}{3}$ 54.33 (f)(1)(ii), the carrier shall provide the number, names, and addriproviding access to broadband service in the preceding calendar year.	
(3012)	Community Anchor Institutions (47 CFR § 54.3.13(f)(1)(iii))	
	is your company a Privately Held ROR Carrier (47 CFR § \$4.313(f)(2)) If yes, does your company file the RUS annual report	Name of Attached Document Listing Required Information (Yes/No) (Yes/No)
Please	check these boxes to confirm that the attached document(s), on line 301	7, contains the required information pursuant to § 54.313(f)(2) compliance requires:
	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Ca	ash Flows
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
		Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)
	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains	
(3019)	Either a copy of their audited financial statement; or (2) a financial report. In a	format comparable to RUS Operating Report for Telecommunications
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of C	Cash Flows
(3021)	Management letter issued by the independent certified public accountant that	t performed the company's financial audit.
	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § \$4.313(f)(2), contains:	
(3022)	independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications	
(3023)	Borrowers, Underlying information subjected to a review by an independent certified	
(3024)	public accountant.	<b>├</b> ─┤
(3025)	Underlying information subjected to an officer certification.  Document(s) for Balance Sheet, Income Statement and Statement of C	ash Flows 401721ar3005.pdf
(3026)	Attach the worksheet listing required information	

Tarried State of Co.	ilon - Reporting Carrier lection Form	FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person Identified in data line <030>	8129352215 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie.wall@smithville.net

### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

	es include ensuring the accuracy of the annual reporting requirements for universal service suppor
recipients; and, to the best of my knowledge, the information report	ed on this form and in any attachments is accurate.
Name of Reporting Carrier: RICE BELT TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier: 401721	Filing Due Date for this form: 07/01/2014

Certificat	on Reporting Car	rier		ASSESSMENT OF THE STATE OF THE	FCC Form 481 4 - 12 - 12 - 12 - 12 - 12 - 12 - 12 -
Data Coll	ection Form	<b>"好话的是</b> "	<b>新日本大学工程的</b>	Service of the servic	QMB Control No. 3060-0986 4
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<015>	Study Area Name	Rice Belt Telephon	e Company Inc.		
<020>	Program Year	2015			
<030>			act regarding this data	Stephanie Wall	man mandama and a second a second and a second a second and a second a second and a second and a second and a
<035>			person identified in dat		
<039>	Contact Email Addr	ess - Email Address of	person identified in dat	a line <0 stephanie.wall@smithville.net	
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Po	reone willfully making t	else statements on this i			34, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment
			under Title 18	of the United States Code, 18 U.S.C. § 1001.	

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<010>	Study Area Code	401721
<015>	Study Area Name	RICE BELT TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Stephanie Wall
<035>	Contact Telephone Number - Number of person identified in data line <030>	8129352215 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	stephanie.wall@smithville.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent) also certify that I am an officer of the reporting carrier; my re agent; and, to the best of my knowledge, the reports and dal	is authorized to submit the information reported on behalf of the reporting carrier sponsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized a provided to the authorized agent is accurate.
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:

### TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent	Authorized to File Annual Reports for CAF or LI Recipies	nts on Behalf of Reporting Carrier
	orized to submit the annual reports for universal service support reporting carrier; and, to the best of my knowledge, the informati	
Name of Reporting Carrier:		
Name of Authorized Agent or Employee of Agent:		
Signature of Authorized Agent or Employee of Agent:		Date;
Printed name of Authorized Agent or Employee of Agent:		
Title or position of Authorized Agent or Employee of Agent		
Telephone number of Authorized Agent or Employee of Ag	ent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

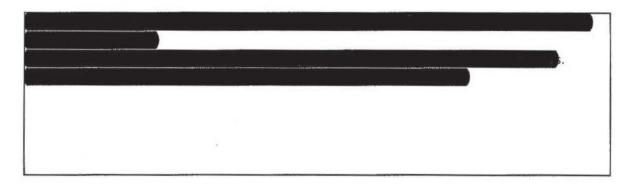
Attachments

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<015>	Study Area	Name			RICE BELT TEL	SO			
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<030>	Contact N	Contact Name - Person USAC should contact regarding this data	d contact regarding	this data	Stephanis Wall		1		
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<015>	Study Area Name		RICE BELT TE	1.00	
<020>	Program Year		2015		
<030>		USAC should contact regarding this data	Stephanie Wal		
<035>		ber - Number of person identified in data line <030>	8129352215 ex		The state of the s
<039>	Contact Email Address -	Email Address of person identified in data line <030>	stephanie.wa	ll@smithville.net	*
<810>	Reporting Carrier	Rice Belt Telephone Company Inc.			
<811>	Holding Company	Rice Belt Holding Inc.			
<812>	Operating Company	Rice Belt Telephone Company Inc.			
<813>	protografia.	<81> Affiliates	1454 (44 <b>5</b> 3)	<g2></g2>	<a3>  Doing Business As Company or Brand Designation</a3>
				3710	Sound annuess we combant of many pesignation
	Rice Belt	Communications Inc.			
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Company:	y: Rice Belt Telephone Company				
Study Area Code:	401721			***************************************	_
Description of networ	k and service area:				_
General location of service:			Arkansas		
Number of Exch	anges:		3		
Total Access Lines:			@ 12/31/2013		
Total Area Served (sq miles):					
Services offered	:				
Voice		X			
Data less than	n 4/1 Mbps	×		availability	4
Data in exces	s of 4/1 Mbps		%	availability	
Video				_	
Long Distance	•	X	7		
Extended Are	a Service	Х			
Switch type, loca	ation and interface t	vpe (IP/GR30	3/TR57):		
Switch type, loca	ation and interface t	type (IP/GR30	3/TR57):		
*					
Access Equipme	nt for broadband, T	DM and IP tra	nsport (IXC & upli	nk):	
			4 amilia v		
Outside Plant de	escription (type and	approximate	age):		
2		- 1			
· ·					
Exchanges:	Access Lines S	q Miles			
Weiner	2		,		
Waldenburg		-	•		
Fishers			1		
Honers			•		
Service Area Map: (se	e instructions)				Notes:
ESRI Shapefile for FCC?					
	band boundaries (e)	visting)?			+
	band boundaries (p				
	ce quality coverage	3	that ware funded	hysupport	

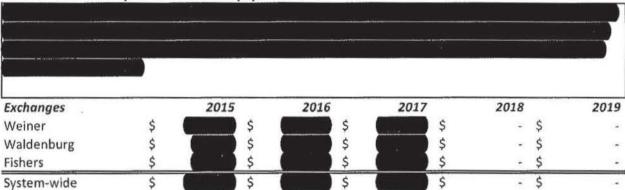


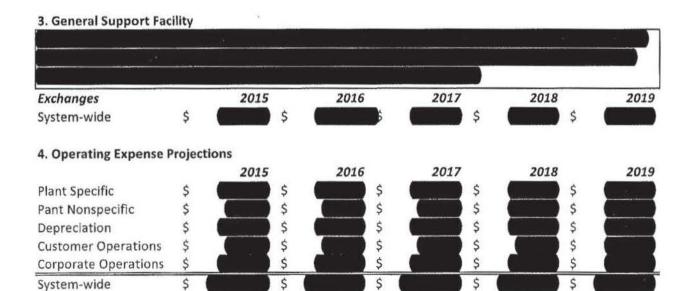
Plant Categories to be updated in five-year plan (include additions & retirements):





2. Cable-Wire Facility & Transmission Equipment







FCC Form 481

Line 510 - Description of Compliance with Service Quality Standards and Consumer Protection

**Rice Belt Telephone Company Inc.** maintains compliance with service quality standards through the use of a variety of tools, including:

- 1. daily, weekly, and monthly detailed service quality reports;
- 2. ongoing employee service quality training;
- 3. regular follow-up inspections of service installation and repairs;
- 4. proactive maintenance programs;
- 5. installation of the latest technologies, such as fiber and IP-based equipment;
- 6. extensive network monitoring equipment; and,
- 7. 24/7/365 service repair availability

Rice Belt Telephone Company Inc. maintains compliance with consumer protection rules through the use of a variety of tools, including:

- ongoing employee training on consumer protection rules;
- working with industry experts to identify and incorporate consumer protection best practices into our processes;
- 3. automated systems using the latest security measures to protect sensitive data;
- 4. monitoring of customer service calls with customers; and,
- 5. regular updates to senior management on consumer protection activities

Annual Reporting for High-Cost Recipients 46 C.F.R. §54.313 (a)(2) through (a)(6) and (h) Rice Belt Telephone Company Inc.

§54.131(a)(5)-COMPLIANCE WITH SERVICE QUAL	TY STANDARDS AND CONSUMER PROTECTION RULES
--	--

	ž.	
Service Quality Standard	s and Consumer Protection Rul	es Annual Certification
Darby A. McCarty	President	Rice Belt Telephone Company, Inc.
Printed Name of Office	er Title of Officer	Company Name
		the Company. I hereby certify that the y standards and consumer protection rules.
Executed on	6-25-14 Date	
Signature _	Parly 6. At les	lg-
Printed/Typed Name _	Darby A. McCarty	



### Rice Belt Telephone Company's Ability to Function in Emergency Situations

Rice Belt Telephone Company ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2). The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Each central office building is supplied with standby generators and battery reserve that enable it to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites and has a maintenance program in place.

Critical core production data (billing, customer, and plant) is stored within a hosted application so it is available from any location. All other network data is backed up to tape on a nightly, weekly and monthly basis. Backup tapes are rotated offsite to a fireproof file cabinet. In addition, there is a one-way replication from the production network to the Company's disaster recovery network daily.

Annual Reporting for High-Cost Recipients 47 C.F.R. §54.313(a)(2) through (a)(6) and (h) Rice Belt Telephone Company Inc.

§54,313(a)(6)-ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Ability to Function in Emergency		
Darby A. McCarty	President	Rice Belt Telephone Company Inc.
Printed Name of Officer	Title of Officer	Company Name
back-up power to ensure function	onality without an external p	The Company has a reasonable amount of power source, is able to reroute traffic ic spikes resulting from emergency situations
Executed on	6/45/2014 Date	
Signature	Carly a nutes	- Gy
Printed/Typed Name	Darby A. McCar	ty

# Rice Belt Holdings, Inc.

Independent Accountants' Review Report and Consolidated Financial Statements

December 31, 2013 and 2012



### Rice Belt Holdings, Inc. December 31, 2013 and 2012

### Contents

Independent Accountants' Review Report
Consolidated Financial Statements
Balance Sheets
Statements of Income
Statements of Stockholder's Equity
Statements of Cash Flows
Notes to Financial Statements
Supplementary Information
Consolidating Schedule - Balance Sheet Information
Consolidating Schedule - Statement of Income and Equity Information
Consolidating Schadula Statement of Cash Flours Information



1600 W. Bloomfield Road, Suite B Bloomington, IN 47403-2043 812.336.8550 Fax 812.331.3037 www.bkd.com

### Independent Accountants' Review Report

Board of Directors Rice Belt Holdings, Inc. Ellettsville, Indiana

We have reviewed the accompanying consolidated balance sheets of Rice Belt Holdings, Inc., a wholly-owned subsidiary of Smithville Holding Company, Inc., as of December 31, 2013 and 2012, and the related consolidated statements of income, stockholder's equity and cash flows for the years then ended. A review includes primarily applying analytical procedures to management's financial data and making inquiries of company management. A review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the financial statements as a whole. Accordingly, we do not express such an opinion.

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America and for designing, implementing, and maintaining internal control relevant to the preparation and fair presentation of the financial statements.

Our responsibility is to conduct the review in accordance with Statements on Standards for Accounting and Review Services issued by the American Institute of Certified Public Accountants. Those standards require us to perform procedures to obtain limited assurance that there are no material modifications that should be made to the financial statements. We believe that the results of our procedures provide a reasonable basis for our report.

Based on our reviews, we are not aware of any material modifications that should be made to the accompanying consolidated financial statements in order for them to be in conformity with accounting principles generally accepted in the United States of America.

Our review was made for the purpose of expressing limited assurance that there are no material modifications that should be made to the financial statements in order for them to be in conformity with accounting principles generally accepted in the United States of America. The accompanying supplementary information is presented for purposes of additional analysis and is not a required part of the basic financial statements, and we did not become aware of any material modifications that should be made to such information.

Bloomington, Indiana April 23, 2014



### Rice Belt Holdings, Inc.

Consolidated Balance Sheets December 31, 2013 and 2012

### Assets

### Current Assets

Cash

Accounts receivable

Inventory

Prepaid and other assets

Total current assets

### **Property and Equipment**

# 2013 2012 \$ \$ \$ \$

### Liabilities and Stockholder's Equity

### **Current Liabilities**

Accounts payable
Accrued expenses and other liabilities
Total current liabilities

### Accounts Payable - Related Party

### Stockholder's Equity

Common stock, \$10 par value, authorized, issued and outstanding 1,000 shares
Additional paid-in capital
Retained earnings
Total stockholder's equity



### Rice Belt Holdings, Inc.

### Consolidated Statements of Income Years Ended December 31, 2013 and 2012

	2013	2012
Operating Revenues Network access service	s	s
Local network service		7
Internet service		
Operating Expenses		
Operating Income		
Other Non-Regulated Income		
Net Income	\$	\$

# Rice Belt Holdings, Inc.

### Consolidated Statements of Stockholder's Equity Years Ended December 31, 2013 and 2012

	Common Stock		Additional Paid-in Capital		Retained Earnings (Deficit)		Total Stockholder's Equity	
Balance, January 1, 2012	\$		\$		\$		\$	
Net income					_		8-	
Balance, December 31, 2012	\$		\$		\$		\$	
Net income				*	-			
Balance, December 31, 2013	\$		\$		\$		\$	

# Rice Belt Holdings, Inc.

### Consolidated Statements of Cash Flows Years Ended December 31, 2013 and 2012

	2013	2012
Operating Activities		
Net income	\$	\$
Items not requiring cash		
Depreciation		
Provision for doubtful accounts		
Limited partnership interest	95 <del>-5</del> 3	
Changes in	2	-
Accounts receivable		
Inventory		
Prepaid and other assets		
Accounts payable		
Accrued expenses and other liabilities		
Net cash provided by operating activities		
Investing Activities		
Additions to property and equipment		8
Proceeds from sale of property and equipment		
Repayment of related party balances		
Net cash used in investing activities		
Increase (Decrease) in Cash		
Cash, Beginning of Year		
Cash, End of Year	\$ ( )	\$

### Rice Belt Holdings, Inc.

# Notes to Consolidated Financial Statements December 31, 2013 and 2012

### Note 1: Nature of Operations and Summary of Significant Accounting Policies

### Nature of Operations

Rice Belt Holdings, Inc. (the Company), a wholly-owned subsidiary of Smithville Holding Company, Inc., is a privately owned holding company that is headquartered in Ellettsville, Indiana. The Company's service area is primarily in southeastern Arkansas. The Company also manages its investments in the following wholly-owned subsidiaries:

Rice Belt Telephone, Inc. (Telephone) is a regulated telephone exchange carrier which earns revenues predominately from local phone, access, intraLATA toll, directory, DSL and other telephone related services.

Rice Belt Communications, Inc. (Communications) is a non-regulated company that provides broadband services utilizing Ethernet technology.

Rice Belt Properties, Inc. (Properties) is a non-regulated company that holds and manages real estate.

Rice Belt Cellular, Inc. (Cellular) is an inactive non-regulated company.

### Significant Accounting Policies

Telephone follows the Uniform System of Accounts prescribed by the Federal Communications Commission (FCC) and the Arkansas Public Service Commission (APSC), which conform in all material respects to accounting principles generally accepted in the United States of America. The non-regulated companies' significant accounting policies conform, in all material respects, to accounting principles generally accepted in the United States of America.

### Principles of Consolidation

The consolidated financial statements include the accounts of the Company and its wholly-owned subsidiaries, Telephone, Communications, Properties and Cellular. All significant intercompany accounts and transactions have been eliminated in consolidation.

### Use of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

### Rice Belt Holdings, Inc.

# Notes to Consolidated Financial Statements December 31, 2013 and 2012

### Cash

At December 31, 2013, the Company's cash accounts exceeded federally insured limits by approximately

### Accounts Receivable

Accounts receivable are stated at the amount billed to customers. The Company provides an allowance for doubtful accounts, which is based upon a review of outstanding receivables, historical collection information and existing economic conditions. If a customer account exceeds 30 days outstanding, a notice of past due status is delivered to the customer. If amount is not paid within eight days of the notice, service is terminated and the customer can only be reactivated if they pay the outstanding balance plus a service fee. Accounts receivable are ordinarily due upon receipt of an invoice. Accounts that are unpaid after the due date incur a late fee. Delinquent receivables are written off based on individual credit evaluation and specific circumstances of the customer.

### Inventory Pricing

Inventories consist of telecommunications related equipment. Inventories are stated at the lower of cost or market using the weighted-average cost method.

### Property and Equipment

Telecommunication plant in service is stated at original cost and includes materials, labor, transportation and certain indirect items such as engineering, supervision and employee benefits. Additions, replacements and renewals determined to be units of property are generally charged to telecommunication plant accounts.

For the Company's regulated and non-regulated operations, composite group depreciation methodology is followed; accordingly, depreciation is provided using a composite straight-line method based on the estimated lives of the various classes of depreciable property. Composite depreciation rates, as applied to the average cost of depreciable property, were approximately and in 2013 and 2012, respectively. Retirements of regulated telecommunication plant are generally charged in total to the accumulated depreciation account, together with the cost of removal less salvage. A gain or loss is recognized at the time of retirement or disposal of non-regulated property and equipment.

The Company charges maintenance and repairs, including the cost of renewals of minor items of property, to the plant-specific operations expense accounts.

# Rice Belt Holdings, Inc. Notes to Consolidated Financial Statements December 31, 2013 and 2012

### Long-lived Asset Impairment

The Company evaluates the recoverability of the carrying value of long-lived assets whenever events or circumstances indicate the carrying amount may not be recoverable. If a long-lived asset is tested for recoverability and the undiscounted estimated future cash flows expected to result from the use and eventual disposition of the asset is less than the carrying amount of the asset, the asset cost is adjusted to fair value and an impairment loss is recognized as the amount by which the carrying amount of a long-lived asset exceeds its fair value.

No asset impairment was recognized during the years ended December 31, 2013 and 2012.

### Income Taxes

The stockholder of the various corporations have elected to have the Companies income taxed as an "S" Corporation under provisions of the Internal Revenue Code and a similar section of the state income tax laws. Therefore, taxable income or loss is reported to the individual stockholder for inclusion in its respective tax returns and no provision for federal and state income taxes is included in these statements.

With a few exceptions, the Companies are no longer subject to U.S. Federal, state and local or non-U.S. income tax examinations by tax authorities for years before 2010.

### Revenue Recognition

Revenues are recognized in the period in which they are earned. Revenue sources for the Companies are comprised of network access service, local and long-distance phone services and internet service.

Telephone's network access and long distance service revenues are derived from charges for access to the Company's local exchange network. The interstate portion of access revenues is based on a cost separation procedure settlement formula administered by the National Exchange Carrier Association (NECA) which is regulated by the FCC. The intrastate portion of access revenues is billed on an individual company tariff access charge structure based on expense and plant investment of the Company as approved by the state regulatory authority. The tariffs developed from these formulas are used to charge the connecting carrier and recognize revenues in the period the traffic is transported based on the minutes of traffic carried. Long distance revenues are recognized at the time a call is placed based on the minutes of traffic processed at contracted rates.

Reported network access revenues are estimates subject to settlement adjustments in the near term resulting from changes in expense and plant investment levels and rate of return experience.

### Taxes Collected From Customers and Remitted to Governmental Authorities

Taxes collected from customers and remitted to governmental authorities are presented in the accompanying consolidated statement of income on a net basis.

### Rice Belt Holdings, Inc.

# Notes to Consolidated Financial Statements December 31, 2013 and 2012

### Note 2: Accounts Receivable

Accounts receivable consist of the following:

	-
Telecommunication receivables	\$ \$
NECA, USF and other receivables	
Provision for doubtful accounts	
	\$ \$

### Note 3: Property and Equipment

Telecommunication plant in se	ervice
Telecommunication plant under	er construction
Non-regulated property and eq	uipment

2013	2012
s <b>T</b>	* 73
7	
\$	\$

2013

2012

### Note 4: Multiemployer Pension Plan

Less accumulated depreciation

The Company contributes to a multiemployer defined benefit pension plan under the terms of an agreement that covers its employees, all of which are non-union. The risks of participating in a multiemployer plan are different from single-employer plans in the following aspects:

- Assets contributed to the multiemployer plan by one employer may be used to provide benefits to employees of other participating employers.
- If a participating employer stops contributing to the plan, the unfunded obligations of the plan may be borne by the remaining participating employers.
- If the Company chooses to stop participating in a multiemployer plan, the Company may
  be required to pay the plan an amount based on the underfunded status of the plan, referred
  to as a withdrawal liability.

The Company's participation in this plan for the years ended December 31, 2013 and 2012, is outlined in the table below. The "EIN/Pension Plan Number" column provides the Employee

### Rice Belt Holdings, Inc.

# Notes to Consolidated Financial Statements December 31, 2013 and 2012

Identification Number (EIN) and the three-digit plan number. The plan does not have a certified zone status as currently defined by the Pension Protection Act of 2006 (PPA) because the Program is considered a multiple employer plan pursuant to the Internal Revenue Code and ERISA. However, the plan is considered a multiemployer plan for financial reporting purposes. The "FIP/RP Status Pending/Implemented" column indicates if a financial improvement plan (FIP) or a rehabilitation plan (RP) is either pending or has been implemented.

	EIN/ Pension Plan	Pension Protection Act Zone	FIP/RP Status Pending/	Conti	Surcharge		
Pension Fund	Number	Status	Implemented	2013	2012	Imposed	
National Telecommunications Cooperative Association	52-0741336-333	N/A	N/A	\$	s Comm	No	

The Company was not listed in its plan's Form 5500 as providing more than 5 percent of the total contributions for the 2012 plan year. At the date the financial statements were issued, Form 5500 was not available for the plan year ending in 2013.

### Note 5: Related Party Transactions

The Company has accounts payable due to a company or companies related through common ownership. The outstanding balance is unsecured and has been classified as a long-term liability. However, the outstanding balance may be repaid at management's discretion based upon available cash, capital needs and other operating considerations.

### Note 6: Significant Estimates and Concentrations

Accounting principles generally accepted in the United States of America require disclosure of certain significant estimates and current vulnerabilities due to certain concentrations. Those matters include the following:

### General Litigation

The Company is subject to claims and lawsuits that arise primarily in the ordinary course of business. It is the opinion of management that the disposition or ultimate resolution of such claims and lawsuits will not have a material adverse effect on the consolidated financial position, results of operations and cash flows of the Company.

### Asset Retirement Obligations

Asset retirement obligations are recorded when the Company has a legal obligation to remediate the property and the amount can be reasonably estimated. No such liabilities were accrued at December 31, 2013 and 2012. Based on existing conditions, the Company believes that such costs,

## Rice Belt Holdings, Inc.

# Notes to Consolidated Financial Statements December 31, 2013 and 2012

if any, would not have a material adverse effect on its financial position or the annual results of its operations.

### Note 7: Subsequent Events

During February 2014, a new entity was formed, Rice Belt Security, LLC (Security). This entity is wholly-owned by Rice Belt Holdings, Inc. and will be operated by its management team. Security will provide alarm monitoring and other security services to residential and commercial customers in the Arkansas operating area.

Subsequent events have been evaluated through the date of the Independent Accountants' Review Report, which is the date the financial statements were available to be issued.

Supplementary Information

# Rice Belt Holdings, Inc.

# Consolidating Schedule – Balance Sheet Information December 31, 2013

	Rice Belt Holdings, Inc.			Rice Belt Communications, Inc.		Rice Beit Properties, Inc.			inating	Rice Belt Holdings, Inc. Consolidated		
Assets	303000000000000000000000000000000000000						ALCOHOLD SEC				(- 111-111-111-111-111-111-111-111-111-1	
Current Assets	100											
Cush												
Accounts receivable					*		35					
Accounts receivable - related party		ė,			*							
Inventory		e.			*		4					
Propaid and other assets				7								
Total current ussets												
Property and Equipment, net					•						Salar Inches	
Investment in Subsidiaries		-	•		<del></del>		<del></del> :					
	•			•	<b>.</b>	•		•		•		
Liabilities and Stockholder's Equity												
Current Liabilities						_						
Accounts payable												
Accrued expenses and other liabilities		_					-					
Total current liabilities	-				<u> </u>				•	_		
Accounts Payable - Related Party		<u> </u>										
Stockholder's Equity (Deficit)												
Common stock		)										
Additional paid-in capital		1			•							
Retained earnings (accumulated deficit)												
Total stockholder's equity (deficit)										_		
	. —	_					_				_	
	1						-					

### Rice Belt Holdings, Inc.

### Consolidating Schedule – Statement of Income and Equity Information Year Ended December 31, 2013

	Rice Belt Holdings, Inc.	Rice Belt Telephone, Inc.	Rice Belt Communications, Inc.	Rice Belt Properties, Inc.	Eliminating Entries	Rice Belt Holdings, Inc. Consolidated
Operating Revenues Network access service Local network service Internet service	• :	· 3	<u> </u>	•	_=	· 3
Operating Expenses						
Operating Income (Loss)						
Other Income (Expense) Income from subsidiaries Other						==
Net Income (Loss)						
Equity (Deficit), Beginning of Year						
Equity (Deficit), End of Year				•		

# Rice Belt Holdings, Inc.

### Consolidating Schedule – Statement of Cash Flows Information Year Ended December 31, 2013

		Rice Belt Idings, Inc.		Rice Belt Telephone, Inc.		Rice Belt munications, Inc.	1	Rice Belt Properties, Inc.	E	liminating Entries	Ho	Rice Belt Idings, Inc. nsolidated
Operating Activities	_	-	-						F320 T	120100-37-		
Net income (loss)					•							
Items not requiring (providing) cash				0		120				-		
Depreciation												
Provision for doubtful accounts												
Income from subsidiares			6									
Changes in												
Accounts receivable												
Inventory		40										
Prepaid and other assets						2		1999245				
Accounts payable												
Accrued expenses and other liabilities												
Net eash provided by				3(1)				1 2 - 1 - 1 - 1 - 1	C XXII			
(used in) operating activities	-		_									
Investing Activities												
Additions to property and equipment		*		Constantinos								The same of
Proceeds from sale of property and equipment												
Advances (repayment) of related party balances												
Net cash provided by				-							3.11=3111=3	- TENDRESS - K
(used in) investing activities	-		-			_	_					
Increase (Decreuse) in Cash		*				•				•		
Cash, Beginning of Year			_									
Cash, End of Year					•				•			